

**LIDDLE & ROBINSON**

800 Third Avenue, 8th Floor  
New York, New York 10022

Jeffrey L. Liddle

(212) 687-8500

*Pro Se*

Motion for *Pro Hac Vice* Admission Pending

**TRENK, DiPASQUALE,**

**DELLA FERA & SODONO, P.C.**

347 Mt. Pleasant Avenue, Suite 300

West Orange, NJ 07052

(973) 243-8600

Henry M. Karwowski

Joshua H. Raymond

(973) 243-8600

[hkarwowski@trenklawfirm.com](mailto:hkarwowski@trenklawfirm.com)

Local Counsel for Plaintiff

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

ERIC A ZAKARIN,

Debtor.

Case No.: 18-14226 (RG)

Chapter 7

LIDDLE & ROBINSON, LLP,

Plaintiff,

v.

ERIC A. ZAKARIN,

Defendant.

Adv. Pro No.: 18-01272 (RG)

Hearing Date: September 18, 2018  
at 11:00 AM

Oral Argument Requested

**NOTICE OF MOTION OF PLAINTIFF LIDDLE & ROBINSON, LLP FOR  
ENTRY OF ORDER EXTENDING TIME TO FILE ADVERSARY COMPLAINT**

**PLEASE TAKE NOTICE** that on the 18th day of September, 2018 at 11:00 a.m., or as soon thereafter as counsel may be heard, Liddle & Robinson, LLP, by and through local counsel, Trenk, DiPasquale, Della Fera & Sodono, P.C., shall move before the Honorable Rosemary Gambardella, United States Bankruptcy Court, M.L. King, Jr. Fed'l Building and Courthouse, 3rd Floor, 50 Walnut Street, Newark, New Jersey, for entry of an order extending the time within which to file an Adversary Complaint.

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, Liddle & Robinson, LLP shall rely upon the enclosed Memorandum of Law, Certification with supporting exhibits, proposed form of order, and oral argument of its counsel.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court and served on the undersigned in accordance with the applicable rules.

**PLEASE TAKE FURTHER NOTICE** that unless opposition is timely filed and served, the Motion will be decided on the papers in accordance with D.N.J. LBR 9013-3(d).

**LIDDLE & ROBINSON, LLP**  
*Pro Se*

**TRENK, DiPASQUALE,  
DELLA FERA & SODONO, P.C.**  
Local Counsel for Plaintiff

By: /s/ Henry M. Karwowski  
HENRY M. KARWOWSKI

Dated: August 17, 2018